

JANE ROE,
Plaintiff,

v.

LARRY CRAWFORD, Director of the Missouri
Corrections, in his official capacity, and
CYNDI PRUDEN, Acting Superintendent,
Women's Eastern Reception, Diagnostic and
Correctional Center, in her official capacity,
Defendants.

CIVIL ACTION No. _____

**APPLICATION FOR TEMPORARY
RESTRAINING ORDER AND/OR
PRELIMINARY
INJUNCTION**

1. I am employed by Planned Parenthood of St. Louis (Planned Parenthood), 4251 Forest Park Avenue, St. Louis, MO 63108. I am employed as a Counseling Services Supervisor. I have worked at Planned Parenthood since 1995.
2. Abortions can be safely performed as a one-day outpatient procedure up until a gestational age of eighteen (18) weeks at this facility. Planned Parenthood performs procedures on Tuesdays, Wednesday evenings, Fridays and Saturdays.
3. However, for 14 ½ weeks to 17 ½ weeks procedures are on Fridays only, after eighteen (18) weeks medical concerns require the procedure to be performed over two days on Fridays and Saturdays only. A two-day procedure would substantially increase the burdens on the health of Plaintiff and will increase substantially its cost. Planned Parenthood only performs these services starting on Friday and continuing on Saturday.


After 22 weeks, abortions cannot be performed in the St. Louis region. The burden on the correctional facility will be much less if this matter can be performed as a one-day procedure.

4. Although abortions are extremely safe, the risk of abortion increases significantly with delay. The risk of major medical complications increases the further a woman is in her pregnancy.

5. Prisoners from Women's Eastern Reception, Diagnostic and Correctional Center (WERDCC) were routinely escorted to Planned Parenthood of St. Louis for abortions as recently as some time in 2004. WERDCC inmates were typically escorted by two guards who were able to remain with the inmate the entire time, except during the actual procedure (during which they were stationed immediately outside the room). If situations required, one guard could remain with the patient during the procedure. Planned Parenthood arranged for the procedures to occur in a private room apart from their regular clientele.

I declare under penalty of perjury that the foregoing information is true and correct.

Dated: 10/13/05

 MSW, LCSW
Sharon Tobin, MSW, LCSW
Counseling Services Supervisor